## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION

Master Docket No. 3:12-CV-01893-MAS-TJB

PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENTS WITH CRESTAR DEFENDANTS, MOORING, MASTELLONE, DEL VECCHIO DEFENDANTS, BANKATLANTIC DEFENDANTS, PAM DEFENDANTS, AND WOLFSON DEFENDANTS, PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS, APPOINTMENT OF INTERIM CLASS COUNSEL AS SETTLEMENT CLASS COUNSEL, APPOINTMENT OF INTERIM LIAISON COUNSEL AS LIAISON COUNSEL, AND APPROVAL OF CLASS NOTICE AND PLAN OF DISTRIBUTION

### TO: ALL COUNSEL IN THE CAPTIONED MATTER

PLEASE TAKE NOTICE that on April 20, 2015 at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiffs will move before Hon. Michael A. Shipp, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order granting preliminary approval of settlements with the Crestar Defendants, Mooring, Mastellone, the Del Vecchio Defendants, the BankAtlantic Defendants, the PAM Defendants, and the Wolfson Defendants, preliminary certification of settlement class, appointment of Interim Class Counsel as Settlement Class Counsel, appointment of Interim Liaison Counsel as Liaison Counsel and approval of class notice and plan of distribution.

## PLEASE TAKE FURTHER NOTICE that, in support of this motion,

Plaintiffs will rely upon the accompanying Memorandum of Law and Declaration of Jason A. Zweig, with attached exhibits. A proposed form of Order is also submitted herewith.

# LITE DEPALMA GREENBERG, LLC

Dated: March 27, 2015

/s/ Bruce D. Greenberg
Bruce D. Greenberg
Two Gateway Center, Suite 1201
Newark, New Jersey 07102-5003

Tel: (973) 623-3000 Fax: (973) 623-0858

bgreenberg@litedepalma.com

Interim Liaison Counsel

### HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman (admitted *pro hac vice*) 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101

Tel: (206) 623-7292 Fax: (206) 623-0594 steve@hbsslaw.com

#### HAGENS BERMAN SOBOL SHAPIRO LLP

Jason A. Zweig (admitted *pro hac vice*) 555 Fifth Avenue, Suite 1700 New York, NY 10017

Tel: (212) 856-7227 Fax: (917) 210-3980 jasonz@hbsslaw.com

### HAUSFELD LLP

Michael D. Hausfeld (admitted *pro hac vice*) James J. Pizzirusso (admitted *pro hac vice*) Seth R. Gassman (admitted *pro hac vice*) 1700 K Street, NW, Suite 650 Washington, DC 20006 Tel: 202-540-7200 Fax: 202-540-7201 mhausfeld@hausfeldllp.com jpizzirusso@hausfeldllp.com

Interim Class Counsel

sgassman@hausfeldllp.com